

DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

HSB Homes Ltd collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with data protection regulation and we are responsible as a data controller of that personal data for the purposes of those laws.

When we mention "HSBH Ltd", "we", "us" or "our" we are referring to HSB Homes Ltd.

We, HSB Homes Ltd is a company registered in England and Wales 4426184. HSB Homes Ltd whose registered office is at 1 Peterfield Road, Hampton Vale, Peterborough, Cambs, PE7 8NR.

The personal data we collect and use

We collect information from a Landlord when managing a property to let. We collect information from a tenant when registering or applying for accommodation and for our use of referencing prospective tenants. We collect the following personal data when you provide it to us:

- Contact information (telephone numbers, email address, next of kin)

- Identity information (name, date of birth, address including any previous addresses, marital status, national insurance number and nationality)
- Current residential status (details of current/previous landlord)
- Guarantor name, email address, telephone number, date of birth, address history for the last 3 years, marital status, national insurance number, nationality and next of kin
- Employment status of tenants and/or guarantors, (name of employer and/or previous employer and/or college/university where you are studying, address, phone number, email address, fax number for the employer/accountant, payroll numbers, length of employment, salary information to include overtime, commission, bonuses and any other income received).
- Number of dependents and ages
- Details of any state benefits that you are receiving or will be applying for during the tenancy
- Bank account details of the tenant, including account number and sort code
- Details of any adverse credit during the last 6 years
- Property address, term, rent, deposit, utility and service providers
- Landlord contact information (address, telephone number, email address, details of the property to be let, utility suppliers, bank details)

How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> • to undertake and perform our obligations and duties to you in accordance with the terms of the contract with you, including the submission of the deposit 	Performance of a contract	The Deposit Protection Service
<ul style="list-style-type: none"> • to enable us to supply you with the services and information you have requested 	Performance of a contract	None
<ul style="list-style-type: none"> • to carry out due diligence on any prospective tenant, including details of adverse credit 	Legitimate interests	Rent4Sure, Lets XL
<ul style="list-style-type: none"> • to manage the tenancy, including the instruction of maintenance for any necessary works, including gas safety checks, electrical reports and necessary assessments 	Performance of a contract	All maintenance Contractors authorised by HSBH Ltd
<ul style="list-style-type: none"> • to retain records of any tenancy, including for the purpose of future references 	Legitimate interests	External supplier(s) of data storage and data hosting services to retain records on our behalf
<ul style="list-style-type: none"> • to advise the necessary suppliers for all utilities, council tax 	Legitimate interests	Utility Suppliers, Local Authority
<ul style="list-style-type: none"> • to market the property and produce property details 	Performance of a contract	Property portals
<ul style="list-style-type: none"> • to provide you with details of products and services from us and third parties that may be of interest to you in accordance with your preferences. For more information see 'Marketing' below 	Consent	None

Sharing of Your Information

The information you provide to us will be confidential. We may disclose your information to other third parties who act for the purposes set out in this notice or for purposes approved by you, including the following:

To carry out due diligence on you as a prospective tenant/guarantor, including but not limited to carrying out affordability checks, due diligence checks, obtaining adverse credit history, and obtaining references from relevant parties whose data you have provided.

If you are unable to make payments under your tenancy, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant

In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, facilities manager or any other person or organisation in connection with this

In order to service the tenancy for a property which requires a selective licence, details of the property and tenancy may need to be shared with the local authority and any other organisation that the local authority deem necessary.

Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection. In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. If you have parental responsibility for children under the age of 16, it is very likely we will record information on our systems that relates to those children, such as names and ages.

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and then have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 01733 390266

By email: lettings@hsbh.co.uk

By Post: 1 Peterfield Road, Hampton Vale, Peterborough, Cambs, PE7 8NR

[In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every email.]

Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide a tenancy.

How long your personal data will be kept

We will hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see 'Your rights' below.

Your rights

You have legal rights under data protection regulation in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but we would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your

information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To contest decisions based on automatic decision making

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

To obtain a copy of our safety measures for transfers outside of Europe

You can ask for a copy of, or reference to, the safeguards we have put in place when your personal data is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.]

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer at lettings@hsbh.co.uk or 1 Peterfield Road, Hampton Vale, Peterborough, Cambs, PE7 8NR;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Website Cookies

Our site uses cookies to ensure that we give you the best experience on our website. Our site uses cookies to collect data of visitor usage by using a cookie file which is stored on your browser or the hard drive of your computer. They help us to improve our site and help to deliver a better service.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with data protection regulation (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer please send an email to lettings@hsbh.co.uk or write to 1 Peterfield Road, Hampton Vale, Peterborough, Cambs, PE7 8NR.